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CIRCULAR 083-17

June 5, 2017

(Updated January 15, 2019)¹

**REGULATION RESPECTING ELECTRONIC TRADING AND
DIRECT ELECTRONIC ACCESS TO MARKETPLACES
FREQUENTLY ASKED QUESTIONS**

This circular is intended to provide approved and foreign approved participants (“the Participants”) of Bourse de Montréal Inc. (the “Bourse”) a list of frequently asked questions (FAQ) pursuant to *Regulation 23-103 Respecting Electronic Access to Marketplaces* (“the ETR”) requirements.

One of the requirements of the ETR, reflected in Article 3.5 (b) (vii)² of the Rules of the Bourse, is the assignment by the Participant of a client identifier (the “Client ID”) for each of their clients granted direct electronic access (“DEA client”) to the Bourse.

Questions and Answers

The following are specific questions and their responses by the Regulatory Division of the Bourse (“the Division”).

1. What form of DEA Client ID does the Bourse require?

The Bourse requires that the Participant submit the Client ID for each client who is given direct electronic access through one of the two available forms, depending on whether the Fix Protocol or the Sail Protocol is used.

Fix Protocol

Field	Tag	Field Value	Format	Type	Assigned by
SenderCompID	49	4-8 characters	Alphanumeric	Default	MX
SenderSubID	50	Maximum 11 characters	Alphanumeric	Additional #1	MX
Account	1	Maximum 12 characters	Alphanumeric	Additional #2	Participant

¹ Updated to modify references to the Rules of the Bourse following the publication of the new version of the Rules, effective January 1, 2019

² Formerly Article 6366 B), paragraphs 2.8 and 2.9

SAIL Protocol

Field	Field Value	Format	Type	Assigned by
M-X ID	Maximum 8 characters	Alphanumeric	Default	MX
Clearing Instruction (Account Info)	Maximum 12 characters	Alphanumeric	Additional	Participant

2. For each client given direct electronic access to the Bourse, how should these DEA Clients' orders be identified?

Each order entered and sent to the Bourse for or on behalf of a DEA client must be identified with the appropriate DEA Client ID determined by the participant and established within the parameters of Question 1.

3. What is the purpose of providing the DEA Client IDs to the Division?

It is a regulatory requirement for the Participant to provide the Client IDs to the Division. This is essential as it identifies the clients with direct electronic access submitting orders to the Bourse. This allows the Division to monitor trading on its marketplace.

4. How does the participant notify the Division of DEA Client ID additions and deletions where applicable?

The Bourse provides on its website, a downloadable spreadsheet template to facilitate reporting. The spreadsheet is accessible under the "Circulars" section of the "Publications" tab and by selecting the annex of the Circular [046-17](#), or by clicking [here](#). Once the Annex form is completed with the required information, the form can be submitted via email to client_ID_reg@tmx.com.

5. How often must the DEA Client IDs be submitted to the Division?

Upon granting direct electronic access to the client, the Participant must immediately inform the Division of this addition in the prescribed manner. (Art. 4.6. 3) b) Regulation 23-103 respecting electronic trading and direct electronic access to marketplace)

If a client ceases to be a DEA client, the Participant must promptly inform the Division as well.

An appropriate DEA Client ID form must be submitted to the Division each time an additional client is identified and has been granted electronic access to the Bourse and where the use of a Client ID is required. The Bourse expects the Client IDs be reported in a prompt manner as per Circular [046-17](#) and Article 3.5³ of the Rules of the Bourse.

6. Does the Bourse require Client ID disclosure for inactive DEA clients as well?

Yes. The Bourse's expectation is to have the Participant submit, to the Division, a Client ID form for all clients who have direct electronic access to the Bourse whether active and inactive.

³ Formerly Article 6366 B)

7. Does the Bourse require the Client ID information of the end clients of DEA clients whom they provide access to the Bourse?

No. The Bourse only requires a client identifier for each DEA client of the Participant, and not for clients of the DEA client.

8. Who should be contacted for any DEA Client ID related questions?

Participants may contact the Division at info.mxr@tmx.com for regulatory-related questions and the Bourse's Technical Help Desk at samsupport@tmx.com for questions of a technical nature.

9. For the FIX Protocol, is it possible to submit the CME Tag 50 to the Division instead of the SenderSubID Tag 50 assigned by the Bourse?

Yes. Participants may have the option to submit the CME Tag 50 to the Division instead of the SenderSubID Tag 50 assigned by the Bourse. However, prior to making any modification, Participants must communicate the Tag 50 information to the Technical Help Desk, at 1-877-588-8489, or by email at samsupport@tmx.com.

For further information, please contact the Regulatory Division, at (514) 787-6530, toll-free at 1-800-361-5353 ext. 46530, or by email at info.mxr@tmx.com.

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